

**CHAITMAN LLP**

465 Park Avenue

New York, New York 10022

Phone & Fax: (888) 759-1114

Helen Davis Chaitman

[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)

*Attorneys for Defendants Carol Nelson and Stanley Nelson*

**UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant,  
and STANLEY NELSON, individually and as joint  
tenant,

Defendants.

Adv. Pro No. 10-04377 (SMB)

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON,

Defendant.

Adv. Pro No. 10-04658 (SMB)

**CERTIFICATE OF SERVICE**

I, Helen Davis Chaitman, hereby certify that on November 6, 2019, I caused a true and correct copy of the following documents:

Supplemental Memorandum of Law in Further Support of Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction

to be filed electronically with the Court and served upon the parties in this action who receive electronic service through CM/ECF, and by electronic mail upon:

David J. Sheehan, Esq.  
Dean Hunt, Esq.  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: 212-589-4616  
Facsimile: 212-589-4201  
[dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: November 6, 2019  
New York, New York

/s/ Helen Davis Chaitman